

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

GÉRARD SILLAM and
ALDRIC SAULNIER

Plaintiffs,

vs

LABATON SUCHAROW LLP and
CHRISTOPHER J. KELLER,

Defendants.

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) Civil Action No.
) 21 CV 6675 (CM) (OTW)
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ORIGINAL

Volume I of II

Deposition of Gérard Sillam

taken on

Friday, May 5, 2023

Reported by: Shelle Higgins

CSR NO. 10455, CLVS

Deposition of Gérard Sillam, taken on behalf of the parties at Reed Smith LLP, 112 avenue Kléber, 75116, Paris, France, on Friday, May 5, 2023, at 3:00 p.m., before Shelle Higgins, CSR NO. 10455, pursuant to notice.

APPEARANCES:

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1 anyone before today?

2 **A.** Yes, to my lawyer.

3 **MR. MATETSKY:** I'll note for the record it's
4 possible I missed something, but I don't recall ever
5 seeing it before. 15:59

6 **MS. LARROQUE:** I wish to circulate the
7 document.

8 **MR. MATETSKY:** We would appreciate that, and
9 I'll reserve the right to come back to it at the end
10 of the day. 15:59

11 **BY MR. MATETSKY:**

12 **Q.** Mr. Sillam, have you ever been convicted of
13 a crime anywhere outside of France?

14 **A.** No, never.

15 **Q.** Has any company that you own or are 16:00
16 affiliated with been convicted of a crime either
17 inside or outside France?

18 **A.** No.

19 **Q.** And do you understand when I say convicted
20 of a crime, I'm including both either pleading guilty 16:00
21 or being convicted after a trial?

22 **A.** Yes, I understand.

23 **Q.** Mr. Sillam, have you ever been the subject
24 of a criminal investigation by the authorities in
25 France? 16:01

1 **MR. REDA:** Objection. Note my objection to
2 an improper question.

3 **BY MR. MATETSKY:**

4 **Q.** You can answer.

5 **A.** Yes. 16:01

6 **Q.** Approximately how many times have you been
7 the subject of a criminal investigation by the French
8 authorities?

9 **A.** Four. Four or five.

10 **Q.** How did that come about? 16:02

11 **A.** I have absolutely no problem in answering
12 your questions. Let's start with the receivership.
13 I went into receivership, as I indicated earlier, on
14 a personal basis in 1994 for my real estate business.
15 That real estate business held a lot of assets and 16:03
16 the bankruptcy trustee had a lot of questions about
17 these assets.

18 In fact, these questions related mainly to
19 the selling price of the real estate, the buildings,
20 because between 1990 and 1997, France experienced a 16:04
21 major real estate crisis. Real estate prices, in
22 fact, collapsed all together, and this meant we had
23 to sell at a price which was lower than the buying
24 price.

25 The bankruptcy trustee's job is precisely to 16:04